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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,

v.

YOANY VAILLANT,
a/k/a Yoany Vaillant Fajardo,
Defendant.

Case No. 2:22-cr-00030-APG-DJA

**Stipulation to Continue Response and
Reply Deadlines for Two Weeks for
Defendant Vaillant's Motion to Sever
(ECF No. 100)**

Plaintiff United States of America, by and through its counsel, Jason M. Frierson,
United States Attorney, though Jessica Oliva, Assistant United States Attorney, and
Kenneth A. Polite, Jr. Assistant Attorney General, through Matthew A. Lamberti, Senior

Counsel; and Defendant Yoany Vaillant, by and through his counsel, Christopher R. Oram, Esq.; hereby stipulate and agree to continue the June 30, 2023 Response and the July 7, 2023 Reply deadlines as to Vaillant's Motion to Sever Defendant (ECF No. 100), to July 14, 2023 and July 21, 2023, respectively.

The parties enter this stipulation for the following reasons:

1. On June 16, 2023, Vaillant filed a Motion to Sever Defendant at ECF No. 100.

2. Under Local Rule LR 7-2(b), the deadline to file and serve any points and authorities in response to a motion is 14 days after service of the Motion. The Deadline to file and serve any reply is seven days after service of the response. *Id.*

3. Accordingly, the current deadline for the Government's Response to the Motion to Sever Defendant (ECF No. 100) is June 30, 2023. Vaillant's deadline to file a Reply in Support of the Motion to Sever Defendant (ECF No. 100) is July 7, 2023.

4. The parties are engaging in plea negotiations, and propose postponing the Response and Reply deadlines by two weeks to allow this process to continue. **The new Response deadline would be July 14, 2023, and the new Reply deadline would be July 21, 2023.** Should the parties be successful, the Motion to Sever Defendant would become moot.

5. Trial is currently set for September 11, 2023 at 9:00 am. ECF No. 55. Even assuming the Court denies the Defendants' pending Motion to Continue Trial in this case (ECF No. 84), the parties' proposed briefing schedule would result in the issue being fully briefed more than seven weeks prior to trial.

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6. Accordingly, good cause exists to continue the Response and Reply deadlines by two weeks to permit the parties to engage in plea negotiations, which—if successful—would render the issue moot and thus preserve judicial resources.

Respectfully submitted this 22nd day of June, 2022.

CHRISTOPHER R. ORAM, ESQ.

/s/ Christopher R. Oram
Counsel to Defendant
Yoany VAILLANT

JASON M. FRIERSON
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/s/ Jessica Oliva
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Assistant Attorney General

/s/ Matthew A. Lamberti
MATTHEW A. LAMBERTI
Senior Counsel
MICHAEL CHRISTIN
Trial Attorney
United States Department of Justice

IT IS SO ORDERED this the 23rd day of June, 2023.



HONORABLE RICHARD F. BOULWARE
DISTRICT COURT JUDGE